

# **Exhibit A**

**DiLudovico, Diane (PHL - X46879)**

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**From:** Anthony Fiorentino <anthony@fiorentinolaw.net>  
**Sent:** Monday, April 29, 2024 4:33 PM  
**To:** Soven, Andrew J (PHL - X49554)  
**Cc:** Daniel T. Brier (dbrier@mbklaw.com); Linse, Jessica (PHL - X49570); Tara Goodwin; dedelman@edcombs.com; Carlo Sabatini  
**Subject:** Re: Ballard et al v. Navient  
**Attachments:** Ballard Navient AF 0429 lr counsel.pdf

*[External email]*

Dear Counsel,

Please see the attached letter regarding Defendants' request to re-depose Plaintiffs.

Anthony Fiorentino  
anthony@fiorentinolaw.com  
Phone: 312-305-2850

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**From:** Andrew.Soven@hklaw.com <Andrew.Soven@hklaw.com>  
**Sent:** Thursday, April 25, 2024 1:23 PM  
**To:** Carlo Sabatini <carlo@bankruptcypa.com>; Anthony Fiorentino <anthony@fiorentinolaw.net>; dedelman@edcombs.com <dedelman@edcombs.com>  
**Cc:** Daniel T. Brier (dbrier@mbklaw.com) <dbrier@mbklaw.com>; Jessica.Linse@hklaw.com <Jessica.Linse@hklaw.com>  
**Subject:** RE: Ballard et al v. Navient

Counsel,

Please see the attached letter related to the issues we discussed previously. Thanks.

**Andrew Soven | Holland & Knight**

Partner  
Holland & Knight LLP  
Philadelphia: 1650 Market Street, Suite 3300 | Philadelphia, PA 19103  
New York: 787 Seventh Avenue, 31st Floor | New York, NY 10019  
Phone 215.252.9554 | Mobile 610.212.7813  
[andrew.soven@hklaw.com](mailto:andrew.soven@hklaw.com) | [www.hklaw.com](http://www.hklaw.com)

---

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**From:** Soven, Andrew J (PHL - X49554) <Andrew.Soven@hklaw.com>  
**Sent:** Monday, April 22, 2024 4:16 PM  
**To:** Carlo Sabatini <carlo@bankruptcypa.com>; anthony@fiorentinolaw.net; dedelman@edcombs.com  
**Cc:** Daniel T. Brier (dbrier@mbklaw.com) <dbrier@mbklaw.com>; Linse, Jessica (PHL - X49570) <Jessica.Linse@hklaw.com>  
**Subject:** Re: Ballard et al v. Navient

Ok.

Andrew Soven  
Holland & Knight LLP  
Office 215.252.9554  
Cell 610.212.7813  
[Andrew.Soven@hklaw.com](mailto:Andrew.Soven@hklaw.com)

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**From:** Carlo Sabatini <[carlo@bankruptcypa.com](mailto:carlo@bankruptcypa.com)>  
**Sent:** Monday, April 22, 2024 4:09:57 PM  
**To:** Soven, Andrew J (PHL - X49554) <[Andrew.Soven@hklaw.com](mailto:Andrew.Soven@hklaw.com)>;  
[anthony@fiorentinolaw.net](mailto:anthony@fiorentinolaw.net) <[anthony@fiorentinolaw.net](mailto:anthony@fiorentinolaw.net)>; [dedelman@edcombs.com](mailto:dedelman@edcombs.com) <[dedelman@edcombs.com](mailto:dedelman@edcombs.com)>  
**Cc:** Daniel T. Brier ([dbrier@mbklaw.com](mailto:dbrier@mbklaw.com)) <[dbrier@mbklaw.com](mailto:dbrier@mbklaw.com)>; Linse, Jessica (PHL - X49570)  
<[Jessica.Linse@hklaw.com](mailto:Jessica.Linse@hklaw.com)>  
**Subject:** RE: Ballard et al v. Navient

*[External email]*

It seems unnecessary and I don't remember exactly what the Court said and I don't have my notes here so it seemed the fastest way to get a concurrence to you.

Carlo Sabatini  
Sabatini Law Firm, LLC  
216 N. Blakely St.  
Dunmore, PA 18512  
(570) 614-4444  
[carlo@bankruptcypa.com](mailto:carlo@bankruptcypa.com)

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**From:** [Andrew.Soven@hklaw.com](mailto:Andrew.Soven@hklaw.com) <[Andrew.Soven@hklaw.com](mailto:Andrew.Soven@hklaw.com)>  
**Sent:** Monday, April 22, 2024 4:06 PM  
**To:** Carlo Sabatini <[carlo@bankruptcypa.com](mailto:carlo@bankruptcypa.com)>; [anthony@fiorentinolaw.net](mailto:anthony@fiorentinolaw.net); [dedelman@edcombs.com](mailto:dedelman@edcombs.com)  
**Cc:** Daniel T. Brier ([dbrier@mbklaw.com](mailto:dbrier@mbklaw.com)) <[dbrier@mbklaw.com](mailto:dbrier@mbklaw.com)>; [Jessica.Linse@hklaw.com](mailto:Jessica.Linse@hklaw.com)  
**Subject:** Re: Ballard et al v. Navient

Not sure it matters but what's wrong with 3?

Andrew Soven  
Holland & Knight LLP  
Office 215.252.9554  
Cell 610.212.7813  
[Andrew.Soven@hklaw.com](mailto:Andrew.Soven@hklaw.com)

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**From:** Carlo Sabatini <[carlo@bankruptcypa.com](mailto:carlo@bankruptcypa.com)>  
**Sent:** Monday, April 22, 2024 4:03 PM  
**To:** Soven, Andrew J (PHL - X49554) <[Andrew.Soven@hklaw.com](mailto:Andrew.Soven@hklaw.com)>;  
[anthony@fiorentinolaw.net](mailto:anthony@fiorentinolaw.net) <[anthony@fiorentinolaw.net](mailto:anthony@fiorentinolaw.net)>;  
[dedelman@edcombs.com](mailto:dedelman@edcombs.com) <[dedelman@edcombs.com](mailto:dedelman@edcombs.com)>  
**Cc:** Daniel T. Brier ([dbrier@mbklaw.com](mailto:dbrier@mbklaw.com)) <[dbrier@mbklaw.com](mailto:dbrier@mbklaw.com)>; Linse, Jessica (PHL - X49570)  
<[Jessica.Linse@hklaw.com](mailto:Jessica.Linse@hklaw.com)>  
**Subject:** RE: Ballard et al v. Navient

*[External email]*

Sorry for the delay. I had a brief due today at 4:00 and have been staying out of my email.

If ¶ 3 is removed from the proposed order you may file with concurrence. Thanks.

Carlo Sabatini  
Sabatini Law Firm, LLC  
216 N. Blakely St.  
Dunmore, PA 18512  
(570) 614-4444  
[carlo@bankruptcypa.com](mailto:carlo@bankruptcypa.com)

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**From:** [Andrew.Soven@hklaw.com](mailto:Andrew.Soven@hklaw.com) <[Andrew.Soven@hklaw.com](mailto:Andrew.Soven@hklaw.com)>  
**Sent:** Monday, April 22, 2024 8:56 AM  
**To:** [anthony@fiorentinolaw.net](mailto:anthony@fiorentinolaw.net); Carlo Sabatini <[carlo@bankruptcypa.com](mailto:carlo@bankruptcypa.com)>; [dedelman@edcombs.com](mailto:dedelman@edcombs.com)  
**Cc:** Daniel T. Brier ([dbrier@mbklaw.com](mailto:dbrier@mbklaw.com)) <[dbrier@mbklaw.com](mailto:dbrier@mbklaw.com)>; [Jessica.Linse@hklaw.com](mailto:Jessica.Linse@hklaw.com)  
**Subject:** RE: Ballard et al v. Navient

Attached is a draft unopposed motion seeking an extension of time in light of our discussion last week. Please let us know if you have any comments or questions and we'll get this on file today. Thanks.

**Andrew Soven | Holland & Knight**

Partner  
Holland & Knight LLP  
Philadelphia: 1650 Market Street, Suite 3300 | Philadelphia, PA 19103  
New York: 787 Seventh Avenue, 31st Floor | New York, NY 10019  
Phone 215.252.9554 | Mobile 610.212.7813  
[andrew.soven@hklaw.com](mailto:andrew.soven@hklaw.com) | [www.hklaw.com](http://www.hklaw.com)

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**From:** Soven, Andrew J (PHL - X49554)  
**Sent:** Thursday, April 18, 2024 3:26 PM  
**To:** [anthony@fiorentinolaw.net](mailto:anthony@fiorentinolaw.net); [carlo@bankruptcypa.com](mailto:carlo@bankruptcypa.com); [dedelman@edcombs.com](mailto:dedelman@edcombs.com)  
**Cc:** Daniel T. Brier ([dbrier@mbklaw.com](mailto:dbrier@mbklaw.com)) <[dbrier@mbklaw.com](mailto:dbrier@mbklaw.com)>; Linse, Jessica (PHL - X49570)  
<[Jessica.Linse@hklaw.com](mailto:Jessica.Linse@hklaw.com)>  
**Subject:** Ballard et al v. Navient

Counsel,

We have reviewed Plaintiffs' Motion and have had some additional time to get up to speed. After consulting with Navient, I have authority to enter into a stipulation with the terms below. If this is acceptable, we will draft a stipulation for your review and file it on Monday. Because of the significant changes to the class definition since July of 2022 when the three plaintiffs were deposed, we would like the opportunity to take short depositions of Ms. Ballad, Ms. Varno and Mr. Pokorni.

1. Defendants consent to filing of the Third Amended Complaint.
2. Plaintiff will file the TAC within seven days of approval of the stipulated order.
3. Within 20 days of the TAC being filed, Defendants will file their Answer.

4. Within 20 days of the TAC being filed, the parties will confer regarding remaining fact discovery and submit a proposed schedule.

5. Plaintiffs consent to Defendants taking an additional deposition of each named Plaintiff (by Zoom) lasting no more than ninety minutes.

Please let me know if this acceptable. I am available most of tomorrow to discuss but will not be available after 3 on Monday.

**Andrew Soven | Holland & Knight**

Partner

Holland & Knight LLP

Philadelphia: 1650 Market Street, Suite 3300 | Philadelphia, PA 19103

New York: 787 Seventh Avenue, 31st Floor | New York, NY 10019

Phone 215.252.9554 | Mobile 610.212.7813

[andrew.soven@hklaw.com](mailto:andrew.soven@hklaw.com) | [www.hklaw.com](http://www.hklaw.com)

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